

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Kevin A. Bauer, declare under penalty of perjury the following:

At all relevant times, I have been a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. In October of 2023, DEA agents met with a Confidential Source (CS) who stated that Robert THURMAN was responsible for distributing large quantities of marihuana in the St. Louis, Missouri area. According to the CS, THURMAN is also known by the nickname "GLO" or "PLEVEL GLO." The CS stated THURMAN distributes marihuana in quantities of at least 500 – 1,000 pounds per month.

2. THURMAN was said to be living in Miami, Florida, but to also have apartments in the St. Louis and University City, Missouri areas. The CS mentioned that THURMAN had been staying the St. Louis area more often and that THURMAN drives rental vehicles.

3. According to the CS, THURMAN provides marihuana to customers in bulk, himself, and in exchange for United States currency at the time of delivery.

4. In January of 2024, agents were conducting surveillance of THURMAN near his apartment located on Morganford Road in St. Louis, Missouri when agents observed THURMAN, driving a Dodge Durango, park behind a black Chrysler 300. A black male, carrying a backpack, exited the Chrysler 300 and entered into the passenger area of the Durango.

5. Approximately a half an hour later the black male returned to the Chrysler 300 with a backpack. The Chrysler 300 then circled the block and parked again in the same location. Shortly thereafter, the Durango moved locations and parked in front of the Chrysler 300. The black male exited the Chrysler 300, opened his trunk, retrieved a suitcase from the rear of the Durango and placed the suitcase into the trunk of the Chrysler 300. The black male then re-entered the driver's seat of the Chrysler 300 and left the area.

6. Agents continued surveillance of the Chrysler 300 and observed the vehicle enter into Illinois. Agents coordinated with the Illinois State Police to conduct a traffic stop on the vehicle.

7. Illinois State Police conducted a probable cause traffic stop on the Chrysler 300 and conducted a probable cause search of the vehicle. As a result of the search, approximately 14 pounds of marihuana was located in a suitcase in the trunk of the vehicle along with a loaded firearm.

8. On May 3, 2024, while agents were reviewing video surveillance from May 2, 2024, agents observed a black BMW driven by THURMAN enter the garage of the Morganford Road apartments. Agents then saw THURMAN walk into the lobby area of the apartments, from the garage, with a black "Calvin Klein" rolling bag, a tan rolling suitcase, a dark-colored duffel bag, a cross-body satchel, and white plastic grocery bags. Based on previous surveillance of THURMAN, agents believe THURMAN uses suitcases as a common method of transportation of drugs.

9. In the afternoon of May 3, 2024, agents observed a heavy-set male walk into the lobby of the Morganford Road apartments and stand outside of THURMAN's apartment. The male stood outside of THURMAN's apartment for approximately two minutes before being let into the apartment. At this time the male did not appear to have anything in his hands other than his telephone. Agents observed the male exit THURMAN's apartment with a black trash bag and leave the lobby of the building. Agents observed the male place the black trash bag into the passenger side of a van and walk

towards the driver's side of the vehicle. The van then pulled from the curb and traveled into Illinois.

10. Agents followed the van to a residence in East St. Louis, Illinois and observed a second black man enter the passenger side of the van. Agents activated the red and blue emergency lights on their patrol vehicle and pulled in front of the van.

11. At this time the van started drive in reverse but quickly stopped. Agents identified themselves as "police" and approached the vehicle and detained both males. TFO Jake Degener arrived on scene with his K9 partner, Blu, and conducted an open-air sniff of the van. K9 Blu alerted to the odor of narcotics.

12. A search of the van was conducted and a black trash bag was located, in plain view, on the floor of the passenger side rear of the vehicle. Inside the bag agents located three vacuum sealed bundles of suspected marihuana.

13. As the result of the investigation into the drug activity of Robert THURMAN, agents with the DEA Fairview Heights Resident Office executed a search warrant at THURMAN's apartment located on Morganford Road in St. Louis, Missouri. After knocking and announcing their presence, agents made entry into the apartment using a digital code provided by management. Agents determined that the residence was unoccupied.

14. During the search, agents located a large black "Calvin Klein" duffle bag on the floor next to the side of the couch in the living room. The bag contained 17 vacuum sealed bundles of a green leafy substance suspected to be marihuana. In the same location, agents located a cream-colored suitcase containing 16 vacuum sealed bundles of a green leafy substance suspected to be marihuana.

15. In the kitchen, in a cabinet above the dishwasher, agents located four vacuum sealed bags of suspected THC related products, weighing 1.2 pounds.

16. In the kitchen pantry, inside of a variety chip box, underneath bags of chips, agents

located a Glock 20, 10mm, semi-automatic handgun bearing serial number BYGD374, which contained 10mm rounds of ammunition in the magazine along with one round of 10mm ammunition in the chamber, seated in a position to be fired.

17. In the bedroom, inside of zippered Gucci bag, agents located a tied plastic shopping bag containing multiple rubber banded stacks of various denominations of United States currency, later determined to be \$73,880.

18. In the kitchen, in the top corner cabinet, agents located loose bills of United States currency inside of a teal bag. Agents also located two stacks of rubber banded United States currency inside of a white cardboard box, later determined to be \$20,137.02.

19. Also in the kitchen, in the top drawer of the island, agents located one stack of rubber banded United States currency, later determined to be \$1,003. The currency was located on top of THURMAN's Illinois Identification card.

20. In the broiler drawer of the stove, agents located a blue Icebox Diamonds and Watches box, serial number A01102, containing multiple pieces of men's jewelry. The jewelry box contained one Rolex watch, multiple rings, multiple large necklace pendants, and multiple necklaces/bracelets. Agents noted that multiple pieces of the jewelry contained THURMAN's nickname of "GLO" or "P-Level." Based on training and experience, agents know that people who sell narcotics will use proceeds from those sales to purchase expensive high-end items, including jewelry.

21. In the trash can in the kitchen, agents located an empty vacuum sealed clear bag with "P48A" handwritten on the bag. Additionally, agents located cannabis packaging materials in multiple kitchen cabinets. Based on training and experience, agents know that people who sell narcotics routinely package those narcotics in vacuum sealed plastic in an attempt to contain the smell of the narcotics.

22. Agents also located photographs of THURMAN and Kamilya DICKSON together. In the photographs, THURMAN was observed wearing what appeared to be multiple pieces of the jewelry previously located by agents.

23. During the execution of the search warrant, DICKSON arrived at the residence and was subsequently arrested. Agents conducted an audio recorded interview of DICKSON. DICKSON was advised of her Miranda rights which DICKSON stated she understood.

24. DICKSON stated that she resides in the apartment and pays the rent. DICKSON stated that no one else lives in the apartment with her, but she has friends that stay with her. Agents asked DICKSON if Robert THURMAN stays at the apartment. DICKSON stated that THURMAN stays at the apartment "sometimes" and also stated that THURMAN might stay at the apartment when she is not there. DICKSON stated that she lives at the apartment and THURMAN does not pay rent. DICKSON said she provided an access "key" for the apartment to THURMAN and did not believe there was an expiration for access.

25. Agents asked DICKSON about the United States currency found in the apartment. DICKSON responded that she "does hair" in Clayton and has bank receipts. DICKSON said there was cash in her drawers. When asked about a large amount of cash being located in a bag, DICKSON mentioned that she hides money from herself.

26. Agents asked DICKSON how much money was in the apartment and DICKSON stated she was not sure. DICKSON said the money in the apartment is from doing hair and wigs. DICKSON said she has a booking website where clients pay a deposit and then pay the rest in cash. DICKSON stated that she charges a range from \$250 to \$3000 and estimates her profits are \$6,000 to \$10,000 per week on a good week and \$2,000 to \$3,000 on a "chill week." DICKSON stated that the money is not claimed on her taxes and that she is only 19. DICKSON noted that she has only been doing hair for

approximately a year and a half. DICKSON noted that she spreads the money between her business and personal accounts and also spends a lot.

27. DICKSON later clarified that she did not know how much cash was in the apartment, nor did she know how much of it was hers. DICKSON estimated there to be about \$10,000 of her money hidden in the apartment, but she could not provide an exact location of where her money was hidden. DICKSON stated that she had approximately \$2,000 in cash in her purse from a couple of days of sales for hair.

28. DICKSON stated that THURMAN does not give her any cash but will “pay for like my shoes or something.” DICKSON also said that THURMAN does buy her gifts. DICKSON stated that she travels a lot for leisure, including places like Houston, Miami, and Los Angeles.

29. Agents asked DICKSON about the marihuana in the apartment. DICKSON stated that one of her friends must have brought it in and that she was not aware of it. DICKSON stated that THURMAN was one of the friends she was referring to.

30. Agents asked if DICKSON knew anyone named “Glo.” DICKSON at first stated that she did not know anyone with that name, then later identified “Glo” as Robert THURMAN. Agents stated that there was a lot of jewelry located in the apartment and some that had the name “GLO.” DICKSON said that the jewelry was not hers, but she did have some jewelry in the apartment. (DICKSON pointed to a shelf in the bedroom with visible jewelry.)

31. The seized jewelry is more specifically described as follows:

- a. One 14K white gold 3D star ring paved with round diamonds, with an appraised value of \$19,325;
- b. One 14K white gold cross ring with baguette diamond on the cross, ring paved with round diamonds, with an appraised value of \$10,130;
- c. One 14K rose gold cross ring with baguette diamonds on the cross, ring paved with round diamonds, with an appraised value of \$10,110;

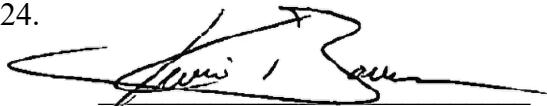
- d. One 14K white gold chain, 19 inches long, with rectangle links of baguette and round diamonds alternating with round links of round diamonds, with an appraised value of \$67,750;
- e. One 14K gold two-tone white/rose gold chain paved with round diamond, with an appraised value of \$61,500;
- f. One 10K gold two-tone white/rose gold bracelet with baguette diamonds in each link with round diamond on each side of each link, clasp is paved with round diamonds, with an appraised value of \$38,150;
- g. One 10K rose gold bracelet with baguette diamonds in each link and round diamond on each side of the link and paved clasp, with an appraised value of \$38,150;
- h. One 14K rose gold chain, 22 inches long, paved with round diamonds, with an appraised value of \$190,250;
- i. One 10K gold rope chain, 22 inches long, 5mm wide, , with an appraised value of \$8,500;
- j. One 10K white/rose gold bracelet with baguette diamonds on each link with round diamonds on the outside of each link, with an appraised value of \$36,000;
- k. One 18K rose gold Rolex with a diamond bezel consisting of 25 .50 c.t. round diamonds and round diamonds covering the case, bracelet and dial, with an appraised value of \$120,000;
- l. One 14K white gold chain, 23 inches long, 20.5 mm wide, paved with round diamonds, with an appraised value of \$162,000;
- m. One 14K white gold bracelet with heart links, with 3 round diamonds in a cluster to make the heart, with rose rhodium and an outer row of round diamonds surrounding to make the link, with an appraised value of \$14,200;
- n. One 10K rose gold bracelet, with 2 rows of baguette diamonds with a row of round diamonds on each side, with an appraised value of \$22,725;
- o. One 14K white/rose gold chain, 20 inches long, with 3 rose links and 3 white links alternating, each link has baguette diamonds in the center with round diamonds on the outside edge, with an appraised value of \$49,850;

- p. One 10K which gold charm with cutout rose gold letters “GLO” paved with diamonds and with a rose gold diamond bail, with an appraised value of \$40,400;
- q. One 14K rose gold ring with letters “GLO” paved with round diamonds, with an appraised value of \$24,275;
- r. One 10K rose gold charm paved with round diamonds and the word “PLEVEL” with a diamond bail, with an appraised value of \$96,600;
- s. One 14K white gold charm, rose gold bail, the word “Ray” with the letter “G” underneath and a star on each end of “Ray” paved with round diamonds, with an appraised value of \$33,300;
- t. One 14K white gold gas pump charm with the words “448 BUBB GOD” paved with round diamonds and the center of the gas pump and a marihuana leaf that spins; the letters, spin wheel and gas nozzle are rose gold, with an appraised value of \$56,850;
- u. One 14K rose gold heart shape ring paved with round diamonds, with an appraised value of \$13,000;
- v. One 14K rose gold spinner pendant with the words “CITY OF CHAMPIONS 89 BUBBGOD BLOCKZ” paved with round diamonds and a high polish bridge, bail has baguette diamonds with round diamonds on the sides, the back of the pendant is engraved with numerous names and “just a young nigga selling all that bubba...THE REAL BUBBGOD ONE & ONLY,” with an appraised value of \$208,725; and
- w. One 14K rose/gold pendant, round disc paved with round diamonds and a memorial picture in the center and the words “TRAPIN PEACE” at the top, the sides have rose gold angel wings paved with round diamonds, with an appraised value of \$83,150.

32. Based on the foregoing, declarant believes that the above-described jewelry, with a total estimated value of \$1,404,940, is property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. Section 801 *et seq.*

Pursuant to 28 U.S.C. Section 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of July, 2024.



KEVIN A. BAUER
Task Force Officer
Drug Enforcement Administration